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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE AMERICAN CIVIL LIBERTIES UNION
OF NORTHERN CALIFORNIA, ASIAN LAW
CAUCUS, SAN FRANCISCO BAY
GUARDIAN

Plaintiffs,

v.

FEDERAL BUREAU OF INVESTIGATION,
DEPARTMENT OF JUSTICE,

Defendants.

IAN HEATH GERSHENGORN
Assistant Attorney General
JOHN R. TYLER
Assistant Branch Director
TAMARA ULRICH
Trial Attorney
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Attorneys for Defendants

Case No. 3:10-cv-03759-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
DOCUMENT PRODUCTION
SCHEDULE**

Judge: Hon. Laurel Beeler

1 WHEREAS in April 2011, Defendant agreed to produce all non-exempt documents
2 responsive to Plaintiffs' March 9, 2010 and July 27, 2011 FOIA Requests (the "FOIA Requests")
3 by December 13, 2011 [ECF No. 56];

4 WHEREAS Defendant identified approximately 30,000 pages of additional responsive
5 documents in the summer of 2011 [ECF No. 69];

6 WHEREAS the parties met and conferred regarding the schedule for the production of
7 documents and the method for discussing Defendant's claimed exemptions and conferred with
8 Magistrate Judge Laurel Beeler on November 3, 2011 [ECF Nos. 72, 77], and agreed upon a
9 schedule for the FBI's production of documents in response to the FOIA requests;

10 WHEREAS, per the parties' agreement, as to responsive documents Defendant identified
11 by May 26, 2011, in accordance with the Court's April 13, 2011 Order and Defendant's May 26,
12 2011 Notice Regarding Production Schedule [ECF Nos. 56, 61, 63], the FBI produced all non-
13 exempt documents by December 13, 2011; and

14 WHEREAS, the parties agreed that as to responsive documents Defendant identified after
15 May 26, 2011, Defendant shall process a minimum of 2,500 pages per month in response to the
16 FOIA Requests and shall produce all non-exempt documents by June 30, 2012.

17 IT IS HEREBY AGREED AND STIPULATED THAT:

- 18 1. As to responsive documents Defendant identified after May 26, 2011, Defendant shall
19 process a minimum of 2,500 pages per month in response to the FOIA Requests and
20 shall produce all non-exempt documents by **June 30, 2012**.
- 21 2. The parties will submit a confidential joint letter regarding the method for discussing
22 Defendant's claimed exemptions and contact the courtroom deputy to set a further
23 telephonic settlement conference, per the Court's January 4, 2012 Order
24 (ECF No. 82).

1 Dated: January 10, 2012

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3 By: /s/ Tamara Ulrich
4 TAMARA ULRICH

5 IAN HEATH GERSHENGORN
6 Assistant Attorney General
7 JOHN R. TYLER
8 Assistant Branch Director
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22 JUSTICE

By: /s/ Angela E. Kleine
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[PROPOSED] ORDER

Having reviewed the parties' joint stipulation, and for good cause shown,

It is so ORDERED this ____ day of January, 2012.

The Honorable Laurel Beeler
United States Magistrate Judge

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ATTESTATION OF E-FILED SIGNATURE

I, Angela E. Kleine, am the ECF User whose ID and Password are being used to file this Joint Stipulation and [Proposed] Order Regarding Document Production Schedule. In compliance with General Order 45, X.B., I hereby attest that Julia Harumi Mass, Nasrina Bargzie and Tamara Ulrich have concurred in this filing.

Dated: January 10, 2012 By: /s/ Angela E. Kleine